

RT ENVIRONMENTAL SERVICES, INC.

MEMORANDUM

DATE: May 26, 2000
TO: Wendy Shapss, Gary Silversmith, Doug Lashley
FROM: Gary Brown *GB*
RE: WASTE AND RAW MATERIAL INVENTORIES
RAYMARK FACILITIES - MANHEIM, PA
RT PROJECT #2708-01
CC: H. Ramig, GNI, LWB

As part of Phase 2 work, an inventory of waste materials and raw materials was conducted at the Raymark Facilities in Manheim, PA. The Lower Mill was inventoried on Wednesday, May 10, and the Upper Mill was inventoried on Monday, May 15. A copy of the inventories and field logs is enclosed.

Building #36 in the Upper Mill contains approximately forty-six 55-gallon drums of material that were lab-packed by Environmental Management Solutions (EMS), New Ringgold, PA, for Universal Friction. A copy of their inventory is enclosed, along with a quote for disposal of materials on a list they compiled in 1999.

Building #55 in the Lower Mill contains laboratory chemicals that were not lab-packed by EMS. They were just put in cardboard boxes and left sitting on shelves in the south end of #55. Most are solids, but there are also liquids, including some that are flammable or corrosive. (These are not being stored per building code.)

While there are several buildings that have scrap material or finished product that may contain asbestos, Buildings #16, #38 and #67 still have raw materials that are labeled "asbestos".

Regarding the waste inventory RT recommends the following:

- ▶ We recommend arrangements be made for removing flammable and corrosive as well as poisonous hazardous waste, within 90 days, and also moving such materials to a secure location, acceptable to the local Fire Marshall.

- We recommend that arrangements be made for removal of all hazardous waste, within a 90 day timeframe of April 20th, so that all waste generated as a result of tank removal activities, is removed within the 90 day storage timeframe. (Hazardous waste may only be stored for 90 days; residual waste can only be stored in PA for a maximum of 1 year.)

We expect to have shortly three quotes for removal and disposal of hazardous and residual waste from the site, except for incidental waste that may remain as associated with manufacturing equipment at the facility. We also recommend that a firm schedule for removal of the hazardous and residual waste from the site be committed to prior to the planned meeting with DEP, or alternatively, by the time that the Phase 2 and 3 Site Characterization Report is submitted under the Land Recycling Program.

Should you have any questions, do not hesitate to call. We appreciate the opportunity to be of further service.